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UNITED STATES DISTRICT COURT FOR THE

9 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

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WAYMO LLC,

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Plaintiff,

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vs.

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UBER TECHNOLOGIES, INC.; OTTOMOTTO
15 LLC; OTTO TRUCKING LLC,

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Defendants.

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I, Ali Rayl, declare:

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Case No. 3:17-cv-00939-WHA

**DECLARATION OF ALI RAYL IN
SUPPORT OF WAYMO'S MOTION TO
SEAL DOCUMENTS PURSUANT TO CIV.
L.R. 79-5(d) TO FILE EXHIBITS UNDER
SEAL**

1. I am the Head of Global Customer Experience for Third Party Slack, Inc. ("Slack"). I have sufficient knowledge regarding Slack's and its customers' business operations to identify information that would cause harm to Slack or its customers should it be disclosed publicly. I submit this Declaration under Civ. L. R. 79-5(e)(1) in support of Waymo's Motion to Seal Documents. I have personal knowledge of the facts set forth below and, if called as a witness to testify, could and would testify competently thereto.

2. I have reviewed Exhibits 3, 4, and 6, to Waymo's Motion, which were provided to Slack by counsel for Waymo. Slack withdraws its designation of confidentiality as to those exhibits.

Case No. 3:17-cv-00939-WHA

DECLARATION OF ALI RAYL ISO MOTION TO SEAL

1 3. I have also reviewed Exhibit 8 to Waymo's Motion. Exhibit 8 contains non-public,
2 confidential information about Slack's product capability, and competitive and confidential
3 information about Slack's systems and processes. Slack faces competition from several other
4 services that offer collaboration platforms, and its customers face competition from numerous
5 other services in the customers' respective industries. Public disclosure of this information would
6 cause both Slack and its customers' competitive harm by allowing their competitors access to
7 information regarding how those customers use the Slack platform and what capabilities Slack
8 has, which their competitors could use to gain an unfair advantage over them. As a result,
9 disclosure of this information could jeopardize Slack's business relationship with its customers.

10 4. Thus, the sealing of Exhibit 8 to Waymo's Motion is appropriate to protect Slack and
11 its customers' non-public, confidential, proprietary business information and trade secrets, the
12 public disclosure of which would cause competitive harm to Slack and those customers.

13 5. I declare under penalty of perjury under the laws of the State of California that the
14 foregoing is true and correct.

15 Date: November 10, 2017.


Ali Rayl

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